

# **EXHIBIT 1**

**Subject:** RE: Wishart v. Welkley et al.

**Date:** Friday, March 26, 2021 at 6:16:58 PM Eastern Daylight Time

**From:** Deutsch, Hillel

**To:** Joshua S. Moskovitz

**CC:** Rob Rickner

Gentlemen,

Below is the list of phones in Defendants' possession from all Defendants except Swiatowy – I will provide his response as soon as it is received. I have also temporarily put Rice's new phone as "current phone" – I will follow up with the make/model when that arrives. I expect to get this information to you when I get back to the office on Tuesday.

Hillel

<b>Custodian</b>	<b>Device/Account</b>
Bright	Samsung Galaxy S3
Bright	LG V10
Bright	iPhone X
Bright	Apple iPhone 11pro
Bright	iPhone 4

<b>Custodian</b>	<b>Device/Account</b>
Maryanowski	Flip Phone - Verion LG
Maryanowski	iPhone 8

<b>Custodian</b>	<b>Device/Account</b>
Opperman	Samsung Galaxy S
Opperman	Samsung 8

<b>Custodian</b>	<b>Device/Account</b>
Palistrant	Samsung Galaxy S10

<b>Custodian</b>	<b>Device/Account</b>
Rice	<b>Current phone</b>
Rice	Motorola XT1565

<b>Custodian</b>	<b>Device/Account</b>
Soria	Galaxy S21
Soria	Galaxy Note 5

<b>Custodian</b>	<b>Device/Account</b>
Sullivan	Motorola Droid Turbo
Sullivan	Iphone 11

<b>Custodian</b>	<b>Device/Account</b>
Welkley	LG G7

Hillel Deutsch

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**From:** Joshua S. Moskovitz <josh@moskovitzlaw.com>  
**Sent:** Wednesday, March 24, 2021 3:44 PM  
**To:** Deutsch, Hillel <Hillel.Deutsch@ag.ny.gov>  
**Cc:** Rob Rickner <rob@ricknerpllc.com>  
**Subject:** Re: Wishart v. Welkley et al.

**[EXTERNAL]**

Hillel,

Attached is a letter we received today from 4Discovery, and the spreadsheet referenced in the letter, listing the ESI sources that need to be re-collected.

When can we expect to receive a list of all of your clients' phones so we can complete the task of ESI collection?

**Joshua S. Moskovitz**

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**From:** "Joshua S. Moskovitz" <[josh@moskovitzlaw.com](mailto:josh@moskovitzlaw.com)>  
**Date:** Thursday, March 18, 2021 at 10:56 AM  
**To:** "Deutsch, Hillel" <[Hillel.Deutsch@ag.ny.gov](mailto:Hillel.Deutsch@ag.ny.gov)>  
**Cc:** Rob Rickner <[rob@ricknerpllc.com](mailto:rob@ricknerpllc.com)>  
**Subject:** Wishart v. Welkley et al.

Hillel,

Pursuant to the Court's order yesterday, we need a list of all of your clients' phones so we can complete the task of ESI collection.

In the meanwhile, we have asked 4Discovery to prepare a list of "the devices and accounts that have not been properly collected so that the chosen ESI vendor can complete ESI collection in a forensically sound manner." Order dated Jan. 29, 2021, p. 10.

Thank you,

**Joshua S. Moskovitz**

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